

THE HONORABLE MARSHA J. PECHMAN

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

MATTHEW ADKISSON, an individual,  
  
Plaintiff,

v.

EPIK HOLDINGS, INC., a Washington  
Corporation; EPIK INC., a Washington  
Corporation; MASTERBUCKS LLC, a  
Wyoming company; ROBERT W.  
MONSTER, an individual; and BRIAN  
ROYCE, an individual,

Defendants.

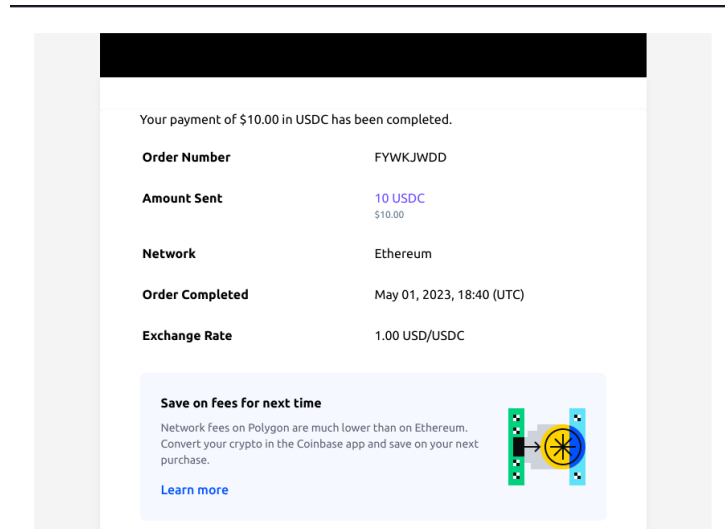
No. 2:23-cv-00495 MJP

DECLARATION OF DEREK PETERSON

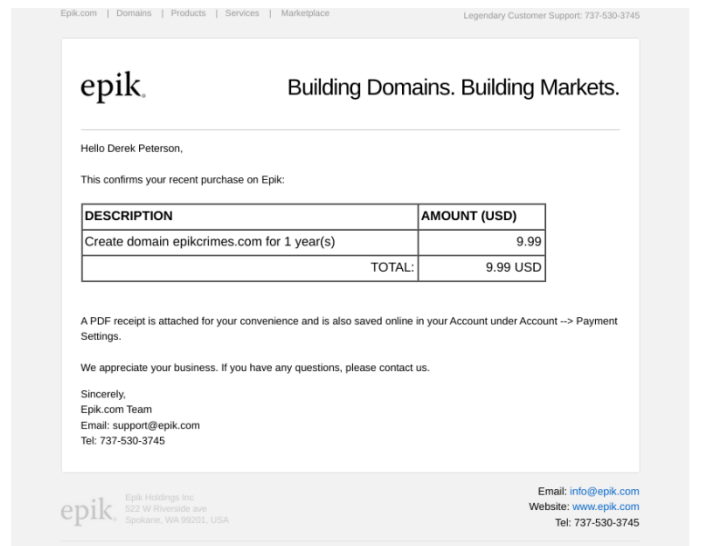
I, Derek Peterson, declare:

1. I am the Chief Executive Officer of The Providence Post.
2. Beginning in or around early 2023, I began seeing numerous posts and consumer complaints regarding Epik accepting payment to register or renew domain names, but then Epik would not actually register or renew the domain name. I decided to test this out for myself. On May 1, 2023, I went to Epik.com to purchase the domain name <epikcrimes.com>. I paid for the domain name using Epik's website with the cryptocurrency Ethereum (\$USDC), transferring a value of \$10.00 in Ethereum to Epik. A screenshot I took confirming this transaction is below.

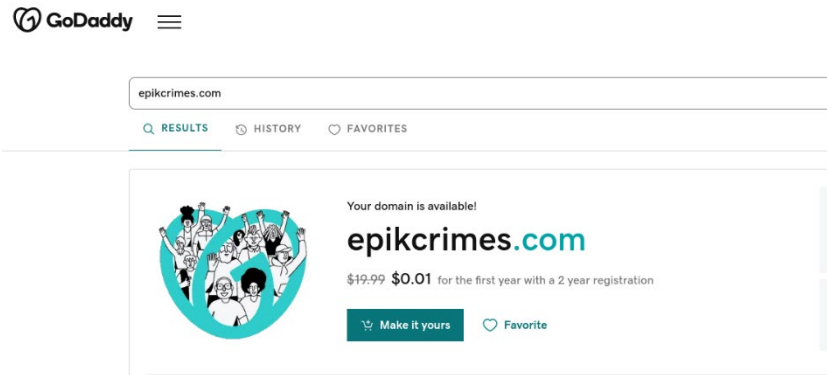
DEREK PETERSON DECLARATION  
(NO. 23-CV-495 MJP) – 1



3. I then received a receipt stating: “This confirms your recent purchase on Epik” for the <epikcrimes.com> domain name, and confirming Epik’s receipt of my payment, as shown in the screenshot I captured below.



4. However, despite that Epik accepted my payment, Epik did not register the domain name for me. In fact, the domain name was still publicly listed for sale, as shown in the screenshot below which I captured after I purchased the <epikcrimes.com> domain name.



5. As of May 26, 2023, the <epikcrimes.com> domain name, which I paid Epik to register, is owned by a third party using a different registrar. I do not own or control the <epikcrimes.com> domain name, and Epik has not refunded me my payment for the domain name.

**I declare under penalty of perjury that the foregoing  
is true and correct.**

EXECUTED this 26th day of May, 2023.

DocuSigned by:

*Derek Peterson*

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Derek Peterson